

STATE OF SOUTH CAROLINA

(Caption of Case)

IN RE:

Happy Rabbit, LP on Behalf of,

Windridge Townhomes, Complainant,

v.

Alpine Utilities, Inc., Respondent

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 360 - S

(Please type or print)

Submitted by: Richard L. WhittSC Bar Number: 62895Address: Austin & Rogers, P.A.Telephone: 803-251-7442508 Hampton Street, Suite 300Fax: 803-252-3679Columbia, South Carolina 29201Other: 803-256-4000Email: rlwhitt@alrlaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiouslyOther: Routine

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit of Publication	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certification of Mailing	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input checked="" type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Return	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input checked="" type="checkbox"/> Other: Answers to Request to Admit	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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January 16, 2009

VIA ELECTRONIC FILING

The Honorable Charles L. A. Terreni
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: • Happy Rabbit, LP on Behalf of Windridge Townhomes, Complainant, v. Alpine Utilities,
Incorporated, Respondent
• Docket No. 2008-360- S
• **Happy Rabbit's Answers to the Requests to Admit of Respondent**

Dear Mr. Terreni:

Enclosed for filing are Happy Rabbit's Answers to the Requests to Admit of
Respondent. A certificate of service is also enclosed.

Respectfully submitted,

/s/

Richard L. Whitt

RLW/jjy

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-360-S

IN RE:

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Windridge Townhomes,

Complainant,

v.

Alpine Utilities, Inc.,
Respondent

**ANSWERS TO REQUESTS
TO ADMIT**

Complainant Happy Rabbit, LP on Behalf of, Windridge Townhomes, (hereinafter, "Happy Rabbit") hereby answers the Requests to Admit of Respondent, which were received by Counsel for Happy Rabbit on December 19, 2008. Any Request to Admit or sub-part thereof, not specifically addressed is denied. Happy Rabbit's answers follow:

1. Admit that Complainant Happy Rabbit, as owner or operator of Windridge Townhomes or otherwise, is a customer of Defendant Alpine Utilities, Inc.

Admitted

2. Admit that Defendant Alpine Utilities, Inc. currently supplies sewer service to Complainant Happy Rabbit.

Admitted

3. Admit that tenants of Windridge Townhomes have not established any customer relationships with Defendant Alpine Utilities, Inc. for the purpose of receiving sewer service at their units in Windridge Townhomes.

Admitted

4. Admit that Complainant Happy Rabbit, as owner or operator of Windridge Townhomes or otherwise, makes sewer service available to the tenants of Windridge Townhomes.

Complainant admits that sewer service is available to tenants of Windridge Townhomes, but sewer service is not made available by Happy Rabbit.

5. Admit that Complainant Happy Rabbit, as owner or operator of Windridge Townhomes, has agreed to include sewer service as part of the rental or lease agreement with tenants of Windridge Townhomes.

Denied.

6. Admit that the sewer service available to tenants of Windridge Townhomes is provided by Complainant Happy Rabbit as a customer of Defendant Alpine Utilities, Inc.

Complainant denies that it provides sewer service to tenants to Windridge Townhomes.

7. Admit that TFB Construction Company constructed the sanitary sewage system to serve Windridge Townhomes.

Information known or readily attainable by Complainant is insufficient to enable it to admit or deny.

8. Admit that TFB Construction Company, for Complex Partnership, entered into an agreement with Defendant Alpine Utilities, Inc. whereby TFB Construction Company, for Complex Partnership, agreed to take sewer service from Defendant Alpine Utilities, Inc. as long as Defendant Alpine Utilities, Inc. remains approved to render such service from the South Carolina Department of Health and Environmental Control.

Information known or readily attainable by Complainant is insufficient to enable it to admit or deny.

9. Admit that Carolyn D. Cook, as prior owner of Windridge Townhomes, purchased Windridge Townhomes subject to the agreement between TFB Construction Company, for Complex Partnership and Defendant Alpine Utilities, Inc.

Denied

10. Admit that Complainant Happy Rabbit purchased Windridge Townhomes subject to the agreement between TFB Construction Company, for Complex Partnership and Defendant Alpine Utilities, Inc.

Denied

Respectfully Submitted,
AUSTIN & ROGERS, PA

_____/s/_____
Richard L. Whitt
508 Hampton Street, Suite 300
Columbia, South Carolina 29201
(803) 256-7442
Attorney for Complainant

RLW/jjy
January 16, 2009
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-360-S

IN RE:

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Windridge Townhomes,)
)
Complainant,)
v.)
)
Alpine Utilities, Inc.,)
Respondent)
_____)

CERTIFICATE OF SERVICE

I, Jessica Yun, an employee of Austin & Rogers, P.A., certify that I mailed a copy of Complainant's Answers to the Requests to Admit of Respondent in the above referenced matter via U.S. mails as addressed below, with proper postage affixed thereto, on January 16, 2009.

Attorney Benjamin P. Mustian
P.O. Box 8416
Columbia S.C., 29202-8416

Austin & Rogers, P.A.

/s/
Jessica Yun

Columbia, South Carolina
January 16, 2009